

**PATENT APPLICATION**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of

Jean-Yves VION-DURY et al.

Group Art Unit: 2151

Application No.: 10/046,314

Examiner: J. WALSH

Filed: January 16, 2002

Docket No.: 111171

For: SYMMETRICAL STRUCTURAL PATTERN MATCHING

**REQUEST FOR RECONSIDERATION**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

In reply to the March 31, 2008 Office Action, reconsideration of the rejection is respectfully requested in light of the following remarks.

Claims 1 and 3-15 are pending in this application.

The courtesies extended to Applicants' representatives by Examiner Walsh at the interview held May 13, 2008, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below, which constitute Applicants' record of the interview.

The Office Action rejects claims 1 and 3-14 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,487,566 to Sundaresan. This rejection is respectfully traversed.

The Office Action asserts that Sundaresan teaches all the features positively recited in pending independent claim 1, including wherein the second code structure comprises a plurality of filter characteristics corresponding to a plurality of possible structural forms of the

first code structure, the plurality of possible structural forms comprising text, trees and graphs. However, this assertion is incorrect.

Sundaresan teaches, in col. 11, lines 34-67, and as further shown in Fig. 3, that XML-based pattern matching is performed in two phases: (1) a pre-processing phase performed by the pre-processing component, and (2) an actual tree matching performed by the pattern matching component. In other words, Sundaresan teaches first converting XML text input into a tree structure, and then performing pattern matching using the tree structure derived from the XML text.

The Office Action alleges that because Sundaresan discloses XML text input and tree structures, that the reference teaches the features as positively recited in the pending claims. Further, in rejecting the pending claims, the Office Action alleges that the first code structure corresponds to XML text, and that a second code structure corresponds to a tree derived from the XML text. The Office Action also alleges that the text, trees and graphs of Sundaresan correspond to the first code structure, as positively recited in the pending claims.

However, the first code structure positively recited in the pending claims, cannot reasonably be considered to correspond to both an XML text document as used in pre-processing, and a tree structure as used in pattern matching, as alleged by the Office Action. Sundaresan teaches XML pattern matching operation performed only on a tree structure, and not on XML input data. In other words, Sundaresan teaches creating a tree structure from a text document, and performing a pattern matching on the tree structure created from the text document. In this manner, the pattern matching of Sundaresan operates only on the tree structure, and not on the XML text document input used to generate the tree. As such, Sundaresan teaches only one possible structural form of what is asserted by the Office Action to be the first code structure of XML text.

Claim 1 positively recites a plurality of possible structural forms of the first code structure, the plurality of possible structural forms comprising text, trees and graphs. These features are discussed on page 1, lines 29-36 and page 2, lines 1-11 of Applicants' disclosure.

During the May 13 personal interview, the Examiner agreed that the method of operation of Sundaresan was as discussed above. The Examiner noted that further search and consideration would be required.

For at least the above reasons, Sundaresan cannot reasonably be considered to teach, or to have suggested, the combinations of all of the features positively recited in pending independent claim 1. Sundaresan also cannot reasonably be considered to teach, or to have suggested, the combination of all the features positively recited in claims 3-15, at least for their dependence on independent claim 1, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the pending rejections of the Office Action under 35 U.S.C. §102(e) are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1 and 3-15 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Date: May 15, 2008

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